

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA**

UNITED STATES OF AMERICA,

Case No.:

Plaintiff,

vs.

TOTOE OPETI SAKARIA JR, &  
BRANDON DAVID MCDONALD

Defendant

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Sarah North, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. This affidavit is submitted in support of a criminal complaint against TOTOE OPETI SAKARIA JR and BRANDON DAVID MCDONALD for violating 18 U.S.C. § 2113 – Bank Robbery.
2. I am familiar with the information contained in this affidavit based upon the investigation I have conducted, in conjunction with other federal, state, and local law enforcement officials, which has included exchanging information with law enforcement officers and others; reviewing video surveillance, reports, database records and other information acquired during this investigation; and reviewing evidence obtained therefrom; and interviewing witnesses.
3. Because I submit this affidavit for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me or the government. I have only included those facts necessary to establish probable cause to believe that TOTOE OPETI SAKARIA JR & BRANDON DAVID MCDONALD have committed a violation of 18 U.S.C. §§ 2113.



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4. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI), and have been since July 2017. Since that time, I have been assigned investigative responsibilities in the areas of violent gangs and criminal enterprises investigation in the FBI Anchorage Field Office, where I am currently assigned to the Violent Crimes squad. The Anchorage Field Office is located within the District of Alaska. During this assignment, I have focused on drug, violent gang, criminal enterprise, bank robbery, human trafficking, child pornography, and felon in possession of a weapon investigations.

**PROBABLE CAUSE**

5. Wells Fargo Bank, N.A., is an institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC).

19. On December 4, 2019, at approximately 2:30 p.m., the Wells Fargo Bank branch located at 5740 Debarr Road, Anchorage, Alaska was robbed by two masked subjects, one of whom brandished a firearm. The subjects stole \$2,624 in cash.

20. At approximately 2:30 p.m. the two subjects entered the north entrance of the bank, and one had a shotgun in his hand. The first subject appeared on video surveillance from the bank as a male, approximately 6' in height, medium build, wearing a black beanie hat, black bandana over his face, black zip up jacket with hood, and black gloves. The second subject appeared on video surveillance to be approximately 6' to 6'2" in height and also medium build. The second subject was wearing a black beanie hat, blue bandana over his face, grey zip up jacket, sunglasses and black gloves. This subject had the shotgun throughout the entire robbery. As the subjects entered the bank, they encountered a security guard and the bank manager who they ordered back inside, and then to get on the ground.

A handwritten signature consisting of a stylized, looped letter 'J' or 'S'.

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21. The first subject approached a teller window and demanded money.
22. A teller placed \$2,624 cash, without counting it, into a bag the first subject provided before handing it back to the subject. The teller then ducked behind the desk.
23. While the first subject approached the teller and demanded money, the second subject stood at the north entrance, holding the shotgun, and demanding everyone get, and stay, on the ground.
24. The subjects then left.

*Identification of subjects*

25. On December 4, several still photos from video surveillance from the Wells Fargo branch of the subjects during the robbery were released to the public via the press and social media. On December 4 and 5, 2019, Task Force Officer (TFO) Troy Clark received calls from multiple individuals who identified the subjects as Totoe “TJ” Opeti Sakaria Jr (hereinafter “Sakaria”) and Brandon David McDonald (hereinafter “McDonald”).
26. On December 6, 2019 SA North and FBI Task Force Officer (TFO) Leonard Torres interviewed McDonald. McDonald claimed he had participated in the bank robbery only as a driver. He claimed a man had called him on December 4, 2019, and told him to meet at Genesis Barber Shop, located at 6311 Debarr Road C, Anchorage, Alaska, immediately.

27. McDonald said he drove to an alley near Genesis, in a Jeep Cherokee, and waited until a Ford Explorer drove up next to him. Sakaria and the man who had called McDonald exited the Ford Explorer wearing black beanie hats, black bandanas, and black jackets. Sakaria was carrying a shotgun. Sakaria and the man who had called

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McDonald entered the Cherokee with McDonald, yelling at him to drive as they had robbed a bank.

28. McDonald drove them to a house in Anchorage. Sakaria and the other man gave McDonald \$2,000 in cash and left the beanie hats and jackets they had been wearing, and shotgun they were carrying, in the vehicle McDonald was driving before going into the house.

29. McDonald wrapped the shotgun and hid it in the crawlspace under his father's house. FBI agents recovered a shotgun from the crawlspace of McDonald's father's house on December 6, 2019.

### CONCLUSION

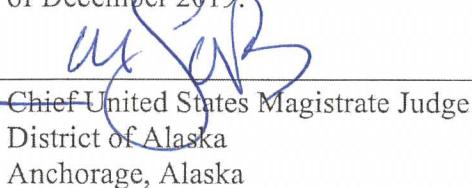
30. Based upon the information above, your affiant submits that there is probable cause to believe that TOTOE OPETI SAKARIA JR and BRANDON DAVID MCDONALD took, by force and violence and by intimidation money belonging to, or under the care, custody, and control of, Wells Fargo Bank branch located at 5740 DeBarr Road in Anchorage, Alaska in violation of 18 U.S.C. § 2113 - Bank Robbery.

Respectfully submitted,



Sarah North  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me this 9 day  
of December 2019.

  
Chief United States Magistrate Judge  
District of Alaska  
Anchorage, Alaska

